

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE REPUBLIC OF RWANDA,

Plaintiff,

-against-

JUSEPH J. FERONE,  
FERONE & FERONE  
333 S. HEALEY AVENUE CORP.,

Defendants.  
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: 07 Civ. 7663 (JSR)  
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**NOTICE OF MOTION**

Upon the accompanying Declarations of David B. Wolf and of Robert F. Van Lierop, both executed on October 18, 2007, and the exhibits thereto, and upon the accompanying memorandum of law, plaintiff The Republic of Rwanda moves this Court, the Hon. Jed S. Rakoff, United States District Judge, for an order, pursuant to 28 U.S.C. § 1927 and the Court's inherent power, awarding attorneys' fees against defendants and against defendants' attorney Alfred A. Delicata, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
October 18, 2007

COWAN DEBAETS ABRAHAMS  
& SHEPPARD LLP

By: 

David B. Wolf (DW-2076)

41 Madison Avenue – 34<sup>th</sup> Floor  
New York, New York 10010  
212. 974-7474  
[dwolf@cdas.com](mailto:dwolf@cdas.com)

Attorneys for Plaintiff

To: Alfred A. Delicata, Esq.  
484 White Plains Road  
Eastchester, New York 10709  
Attorney for Defendants

**PROOF OF SERVICE**

I am employed in the County of New York, State of New York. I am over the age of 18 and not a party to the within action; my business address is 41 Madison Avenue, 34<sup>th</sup> Floor, New York, New York 10014.

On **October 19, 2007**, I caused to be served, via e-mail and Federal Express, the following:

**NOTICE OF MOTION;**

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR AN  
AWARD OF ATTORNEYS' FEES;**

**DECLARATION OF DAVID B. WOLF; and**

**DECLARATION OF ROBERT F. VAN LIEROP**

addressed as follows:

**Alfred A. Delicata, Esq.  
484 White Plains Road  
Eastchester, NY 10709  
italdel@aol.com**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at New York, New York on this 19<sup>th</sup> day of October, 2007.

  
Deborah Mays